

**THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

MICHAEL AND SHELLIE GILMOR,  
et al.,

Plaintiffs,

Case No. 4:10-cv-00189-ODS

vs.

PREFERRED CREDIT CORPORATION,  
et al.,

Defendants.

**UNOPPOSED JOINT MOTION FOR EXTENSION OF TIME  
TO DESIGNATE EXPERT WITNESSES**

Plaintiffs and the IMPAC Defendants respectfully move the Court for an Order extending the deadline by which the parties must designate their respective expert witnesses. In support of this motion, Plaintiffs state as follows:

1. Currently, Plaintiffs' expert designations are due by March 5, 2012, and Defendants' expert designations are due by April 23, 2012.
2. Discovery is currently ongoing and additional information continues to be exchanged. The parties continue to discuss the outstanding and prior discovery requests and are endeavoring to provide full and complete responses as expeditiously as possible.
3. Due to the foregoing, the parties require additional time in which to review additional information received from each other and make them available to their experts for review. Accordingly, the parties request a seven (7) day extension for the parties to make their expert designations. Based on the proposed extension, Plaintiffs would make their expert

designation by March 12, 2012, and Defendants would make their expert designation by April 30, 2012.

4. The additional time requested will not result in any delay in the case, as the proposed deadlines for expert designations would occur before and not affect any other deadline in this case. Therefore, the requested extension will not adversely affect any of the other scheduling or trial deadlines.

5. The instant request to extend the deadline is made in good faith, not for the purpose of delay, and will not prejudice any party.

6. Counsel for the other remaining defendants have been consulted and have indicated that they do not oppose the requested extension.

WHEREFORE, the parties respectfully request the Court to enter an Order extending the deadline by which Plaintiffs and Defendants must make their expert designations: specifically, March 12, 2012 for Plaintiffs' designations, and April 30, 2012 for Defendants' designations, and for any other relief that the Court deems just and proper.

Date: March 2, 2012

Respectfully submitted,

WALTERS BENDER STROHBEHN  
& VAUGHAN, P.C.

By: /s/ Bruce V. Nguyen

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*/s/ Barry L. Pickens*

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*Attorneys for Defendants Impac Mortgage Holdings, Inc.; Impac Funding Corporation; Impac Secured Assets Corporation; IMH Assets Corporation; Impac Real Estate Asset Trust Series 2006-SD1; Deutsche Bank National Trust Company, in its capacity as trustee for the 2006-SD1 Trust and as former trustee for the following trusts, all of which have terminated: Impac Secured Assets CMN Trust Series 1998-1, Impac CMB Trust Series 1999-2, Impac CMB Trust Series 2000-2, Impac CMB Trust Series 2001-4, Impac CMB Trust Series 2002-1, and Impac CMB Trust Series 2003-5; Bank of America, National Association, as successor by merger to LaSalle National Bank, in its capacity as former trustee of terminated trust Impac CMB Trust Series 1999-1; Wells Fargo Bank, N.A., in its capacity as former trustee for terminated trust Impac Mortgage Pass-Through Certificates 2000-1; Litton Loan Servicing LP; and Wingspan Portfolio Advisors, LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this March 2, 2012, I electronically filed the above and foregoing document with the Clerk of Court of the Western District of Missouri using the Court's ECF system, which will send notification of said filing to all counsel of record who are ECF participants.

/s/ Bruce V. Nguyen